

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

NOTICE OF MOTION

- v -

:

05 Cr. 1314 (KMK)

MARIO HENRIQUEZ,

:

:

Defendant.

:

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PLEASE TAKE NOTICE that the undersigned moves this Court, before the Honorable Kenneth M. Karas, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time to be designated by the Court for an order dismissing the indictment, on the grounds that the government engaged in outrageous conduct, or, in the alternative, granting hearings on these motions, and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
July 7, 2006

Respectfully submitted,

LEONARD F. JOY, ESQ.

Federal Defenders of New York, Inc.

By: _____/s/_____
RICHARD F. BOULWARE, ESQ.

Assistant Federal Defender
Attorney for Defendant

MARIO HENRIQUEZ

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TO: MICHAEL J. GARCIA, ESQ.
United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Attn.: **WILLIAM J. STELMACH, ESQ.**
Assistant United States Attorney